

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA

- against -

JOHN DOE,

Defendant.
-----X

MOTION TO WITHDRAW AS COUNSEL
OF RECORD FOR DEFENDANT, JOHN
DOE

2:16-cr-00079-JFB

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ **NOV 01 2018** ★

LONG ISLAND OFFICE

MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT, JOHN DOE

COMES NOW the undersigned counsel, MARK M. O'MARA, ESQUIRE, as attorney of record for the Defendant, JOHN DOE, and hereby files this Motion to Withdraw as Counsel for Defendant, JOHN DOE, and as grounds therefore states as follows:

1. On March 11, 2016, Defendant pleaded guilty to an information and an accompanying Cooperation Agreement. Defendant pleading guilty to violations of 18 U.S.C. § 38(a)(1)(C), 22 U.S.C. § 2778(b)(2) and 13 U.S.C. § 305(a)(1), respectively.

2. Defendant is not, cannot, and will not maintain contractual obligations to undersigned counsel.

3. This matter is presently set for a Status Hearing on Friday, October 26, 2018. There is sufficient time for replacement counsel to review this matter and continue to work with the Defendant to attempt to resolve the matter short of trial or, if necessary, to prepare for trial.

4. Undersigned counsel has discussed this matter with Assistant United States Attorney Mark Misorek, and he has no objection to undersigned counsel withdrawing from this matter, and appointing substitute counsel for the Defendant, should the Court so decide.

WHEREFORE, undersigned counsel respectfully requests this Honorable Court to enter

its Order allowing him to withdraw from further representation of the Defendant, and appointing substitute counsel for the Defendant.

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2018, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Eastern District's Local Rules, and/or the Eastern District's Rules on Electronic Service upon the following parties and participants:

Mark Misorek, Assistant United States Attorney
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

and by regular U.S. Mail and E-Mail on October 2, 2018 to John Doe.

/s/ Mark M. O'Mara
MARK M. O'MARA, ESQUIRE
O'Mara Law Group
221 NE Ivanhoe Boulevard, Suite #200
Orlando, Florida 32804
Telephone: (407) 898-5151
E-Mail: Mark@omaralawgroup.com
Counsel for Defendant

Request granted.

SO ORDERED

S/ Joseph F. Bianco

Joseph F. Bianco
USDJ

Date: Nov. 1 20 18
Central Islip, N.Y.